

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA )  
Plaintiff, )  
v. ) Civil Case No.  
VARIOUS ITEMS SEIZED ON )  
OR ABOUT MARCH, 17 2018 )  
Defendant. )  
\_\_\_\_\_  
)

**ASSENTED-TO MOTION TO EXTEND DEADLINE**  
**FOR THE UNITED STATES TO FILE CIVIL COMPLAINT**

The United States of America, by its attorney, Andrew E. Lelling, United States Attorney for the District of Massachusetts, with the assent of the only person to identify themselves as a Claimant to date, pursuant to 18 U.S.C. § 983(a)(3)(A), respectfully requests an extension of time to file a civil complaint against the following seized property:

- a. \$13,530 in United States currency seized from Woonsocket Wellness on March 17, 2018;
- b. \$98 in United States currency seized on March 17, 2018 from C.M.;
- c. \$222,795 in United States currency seized from Stuart Gitlow on March 17, 2018;
- d. Miscellaneous Silver Coins seized from Stuart Gitlow on March 17, 2018; and
- e. \$319,615.53 in United States currency seized from Bank of America Account ending in 9335, held in the name of Stuart Gitlow;

(collectively, the “Properties”).

The Federal Bureau of Investigation (“FBI”) seized the Properties and commenced administrative forfeiture proceedings. On or about June 19, 2018, the FBI received claims for the

Properties from Stuart Gitlow, through his attorney Anthony M. Traini. (*See*, Exhibit A). No other claims were submitted. On or about July 3, 2018, the United States received copies of these claims from the FBI, and pursuant to 18 U.S.C. § 983(a)(3), a civil complaint must be filed against the Properties within 90 days after the claim was filed in administrative proceedings. Therefore the civil complaint should be filed on or before September 17, 2018.

Pursuant to 18 U.S.C. § 983(a)(3)(A), the Court may extend the time to file a civil forfeiture action upon agreement of the parties. The Parties are in agreement and respectfully request the Court grant an extension of the civil complaint deadline for an additional 90 days.

WHEREFORE, the United States respectfully requests that it be permitted to file the civil complaint on or before December 16, 2018.

Respectfully submitted,

ANDREW E. LELLING  
United States Attorney

By: /s/ David G. Lazarus  
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Dated: August 30, 2018

**CERTIFICATE OF SERVICE**

I, David G. Lazarus, Assistant United State Attorney, certify that the foregoing motion filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and mailed to attorney Anthony M. Traini.

/s/ David G. Lazarus  
DAVID G. LAZARUS  
Assistant United States Attorney

Dated: August 30, 2018